

Mr. Kurt Anderson
Monaco Coach Corporation
P.O. Box 465
Wakarusa, Indiana 46573

Re: CP-039-10912
Modification to Construction Permit CP-039-8662-
00017

Dear Mr. Anderson:

Monaco Coach Corporation was issued a Construction Permit on January 9, 1998, for the Plant No.2 painting operations to be located at the 400 Indiana Avenue, Wakarusa, Indiana, source. Based on further evaluation at the request of Monaco Coach Corporation, the Office of Air Management (OAM) has determined that the following changes shall be made to the permit's operation conditions (bold emphasis has been added to new language):

1. The PSD minor source limit detailed in Operation Condition No. 7 on Page 6 of 12 of the permit shall be modified such that the limits specified are based on the whole limited level of emissions instead of eleven twelfths (11/12) of the limited level of emissions. The revised condition shall be as follows:

That the input of volatile organic compounds (VOCs) to the Plant 2 facilities shall be limited to ~~493.2~~ **210.8** tons per 12 consecutive month period, rolled on a monthly basis. During the first 12 months of operation, the input VOC usage shall not exceed ~~46.4~~ **17.6** tons per month. This input limitation is equivalent to VOC emissions of ~~493.2~~ **210.8** tons per year, and when combined with the VOC emissions increase from the Plant 30 expansion permitted under CP-039-7335-00017, is less than 250 tons per year. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

2. The language of Operation Condition No. 8 (Annual Emissions Reporting) on Page 6 of 12 of the permit shall be changed as follows:

That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee ~~must annually submit an emission statement for the source. This statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4.~~ **shall submit an annual emissions statement in accordance with the applicable provisions of 326 IAC 2-6.** The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

~~The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30.~~

3. Operation Condition No. 12 on Pages 7 and 8 of the permit shall be revised as follows to clarify how compliance with 326 IAC 6-3 will be demonstrated:

12. That pursuant to 326 IAC 6-3 (Process Operations):

(a) The dry filters for particulate matter overspray control shall be ~~in operation~~ **properly in place and maintained to ensure integrity and particulate loading of the filters** at all times when the paint booths are in operation.

(b) The spray booths shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 4.10P^{0.67}$ where: E = rate of emission in pounds per hour,
 P = process weight in tons per hour, if
 P is equal to or less than 60,000 lbs/hr
(30 tons/hr)

or

$E = 55.0P^{0.11} - 40$ where: E = rate of emission in pounds per hour,
 P = process weight in tons per hour, if
 P is greater than 60,000 lbs/hr (30 tons/hr).

(c) ~~Daily inspections shall be performed to verify the placement, integrity and particulate loading of the filters.~~ **The Permittee shall implement an operator-training program.**

(1) **All operators that perform painting operations or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.**

(2) **Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.**

(3) All operators shall be given refresher training annually.

- (d) ~~Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
Records shall be maintained of any non-routine maintenance activities performed on particulate emission control devices which have air flows greater than 4,000 cfm.
- (e) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Note: Page 8a has been added to the permit to provide space for the changes to Condition No. 12.

4. Item (b) of Operation Condition No. 13 on Page 8 of 12 of the permit shall be modified to clarify that spray equipment with a better transfer efficiency than air atomized spray equipment can also be utilized to comply with the intent of the BACT/MACT determination. The change to Item (b) is as follows:

Application of coatings to parts and as paint repair in the paint repair booths shall be done with air atomized spray equipment, **or better**.

5. Item (f) of Operation Condition No. 13 on Page 9 of 12 of the permit shall have the following language added:

At any time end-up seams on the motor homes ~~shall~~ **need to** be filled, **such shall be done** with a hand-lay up resin and gelcoat.

6. The reporting requirements specified in Item (a) of Operation Condition No. 14 on Page 9 of 12 of the permit have been changed to require records only for months when VOC and HAP containing materials are used and to remove the language requiring records of the date(s) of use of these materials. The revised Item (a) shall be as follows:

A quarterly summary shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within thirty (30) calendar days after the end of the quarter being reported in the format attached. These reports shall include the input volatile organic compound usage for the Plant 2 facilities based on VOC and HAP containing material usage records. These records shall include the coating, thinner and clean up solvent usage **for each month in which VOC or HAP containing materials are used, and** material safety data sheets (MSDS) or certified products data sheets (CPDS). ~~and the date(s) of use for VOC and HAP containing materials.~~

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification to the front of the original construction permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Janusz Johnson, OAM at the above address; or by phone at 317-232-8325 or 1800-451-6027 (dial "0" and ask for ext. 2-8325).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

JKJ

Attachments: Modified permit pages - 6 pages

cc: File - Elkhart County
Air Compliance Section Inspector - Greg Wingstrom
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Nancy Landau

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**Monaco Coach Corporation
400 Indiana Avenue
Wakarusa, Indiana 46573**

is hereby authorized to construct
the equipment listed in the Page 2 of this permit.

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-039-8662-00017	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: January 9, 1998
Permit Modification: CP-039-10912	Pages Affected: 6, 7, 8, 8a and 9
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Permit Revocation

5. That pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:
- (a) Violation of any conditions of this permit.
 - (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
 - (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
 - (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
 - (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

Availability of Permit

6. That pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by the IDEM, (local agency if applicable) or other public official having jurisdiction.

PSD Minor Source Limit

7. That the input of volatile organic compounds (VOCs) to the Plant 2 facilities shall be limited to 210.8 tons per 12 consecutive month period, rolled on a monthly basis. During the first 12 months of operation, the input VOC usage shall not exceed 17.6 tons per month. This input limitation is equivalent to VOC emissions of 210.8 tons per year, and when combined with the VOC emissions increase from the Plant 30 expansion permitted under CP-039-7335-00017, is less than 250 tons per year. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

Annual Emission Reporting

8. That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee shall submit an annual emissions statement in accordance with the applicable provisions of 326 IAC 2-6. The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

Opacity Limitations

9. That pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

Dust Collector Operating Condition

10. That pursuant to 326 IAC 6-3 (Process Operations), the dust collectors shall be in operation at all times when sanding operations which have dust collectors are operating, and the emissions from all sanding, controlled and uncontrolled, shall comply with 326 IAC 6-3-2(c) using the following equation:

$$E = 4.10P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour,}$$

P = process weight in tons per hour, if
P is equal to or less than 60,000 lbs/hr (30 tons/hr)

or

$$E = 55.0P^{0.11} - 40 \quad \text{where: } E = \text{rate of emission in pounds per hour,}$$

P = process weight in tons per hour, if
P is greater than 60,000 lbs/hr (30 tons/hr).

Fugitive Dust Emissions

11. That pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), the permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].

12. That pursuant to 326 IAC 6-3 (Process Operations):

- (a) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation.
- (b) The spray booths shall comply with 326 IAC 6-3-2(c) using the following equation:

$$E = 4.10P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour,}$$

P = process weight in tons per hour, if
P is equal to or less than 60,000 lbs/hr (30 tons/hr)

or

$$E = 55.0P^{0.11} - 40 \quad \text{where: } E = \text{rate of emission in pounds per hour,}$$

P = process weight in tons per hour, if
P is greater than 60,000 lbs/hr (30 tons/hr).

- (c) The Permittee shall implement an operator-training program.
 - (1) All operators that perform painting operations or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.
- (d) Records shall be maintained of any non-routine maintenance activities performed on particulate emission control devices which have air flows greater than 4,000 cfm.
- (e) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

BACT/MACT Condition

13. That pursuant to 326 IAC 8-1-6 and 326 IAC 2-1-3.4:

- (a) Application of coatings (primer, base, top, and clear coats) in the production line paint booths shall be done with high volume-low pressure (HVLP) spray equipment. The base coat applied shall contain no less than eight and two tenths percent (8.2%) solids by weight and no more than 6.86 pounds of VOC per gallon of coating less water.

HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
- (b) Application of coatings to parts and as paint repair in the paint repair booths shall be done with air atomized spray equipment, or better.
- (c) Motor homes shall be undercoated with a waterborne-low VOC undercoating.

- (d) Cleaning of motor home exteriors prior to painting, prep of motor homes prior to application of caulks and/or sealant, and miscellaneous cleaning, touch-up, and sealing shall be done with hand-wipe application whenever possible. Aerosol containers shall be supplied for sprayed materials resulting in an airless spray application. Material supplied in tubes and caulks/sealants shall be applied directly from the tube, with hydraulic pressure, or airless systems.
- (e) To the extent possible, collected solvents shall be recycled on-site and/or off-site to recover reusable solvents and minimize waste.
- (f) At any time end-up seams on the motor homes need to be filled, such shall be done with a hand-lay up resin and gelcoat.
- (g) The following work practices shall be observed:
 - (1) All solvent sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
 - (2) Storage containers used to store VOC and/or HAP containing materials shall be kept closed when not in use.
 - (3) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize overspray, avoid drips and spills. Spills and drips shall be cleaned up as soon as practicable.
 - (4) Spray equipment and pumps shall be maintained regularly to minimize drips and seal leaks.
 - (5) Cleanup and solvent/cleaner application rags saturated with VOC or HAP containing materials shall be stored, transported, and disposed of in containers that are tightly closed.

Reporting Requirements

14. That a log of information necessary to document compliance with operation permit condition nos. 7, 12 and 13 shall be maintained. These records shall be kept for at least the past 36 month period and made available upon request to the Office of Air Management (OAM).

- (a) A quarterly summary shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within thirty (30) calendar days after the end of the quarter being reported in the format attached. These reports shall include the input volatile organic compound usage for the Plant 2 facilities based on VOC and HAP containing material usage records. These records shall include the coating, thinner and clean up solvent usage for each month in which VOC or HAP containing materials are used, and material safety data sheets (MSDS) or certified products data sheets (CPDS).

- (b) Unless otherwise specified in this permit, any notice, report, or other submissions required by this permit shall be timely if: